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**IN THE UNITED STATES DISTRICT COURT
FOR THE
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

LISA S. BLACK,)	CIVIL ACTION NO. 05-0038
)	
Plaintiff,)	
)	
vs.)	
)	PLAINTIFF'S PROPOSED
JIM BREWER, individually and in his)	ADDITIONAL VOIR DIRE
official capacity as Acting Principal for)	QUESTIONS
Hopwood Junior High School,)	
COMMONWEALTH OF THE NORTHERN)	
MARIANA ISLANDS PUBLIC SCHOOL)	
SYSTEM, and JOHN AND/OR JANE DOE,)	
)	
Defendants.)	

Plaintiff, by and through counsel, hereby offers the following proposed additional questions to be presented during the voir dire of the jury pool:

1.) There have been many reports in the local media lately relating to the Public School System being in financial trouble (needing to renovate classrooms, hire more teachers and pay for supplies among other things). We need to find out how you feel about potentially making the PSS pay money to someone for something that PSS or one of its School Principals did that

1 was wrong. Assuming that PSS or a Principal has wronged someone and that that person
2 deserves to receive money because of it, are there any of you who would hesitate in deciding
3 that PSS had to pay money because of PSS's current financial situation?
4

5
6 2.) Would any concern you have about PSS's financial situation cause you to award less
7 money to the Plaintiff, assuming you conclude that you should award money to the Plaintiff?
8

9 3.) Would any of you have any trouble awarding money for emotional distress?
10

11 4.) One of the issues that will come up in this trial is whether or not Plaintiff should receive
12 money because the actions of the Defendants may have caused a skin condition that she has to
13 get worse. Some people might have trouble including money in a verdict for a condition that
14 the Plaintiff had long before the Defendants got involved. Would any of you have trouble
15 including money in a verdict if the evidence persuaded you that the actions of the Defendants
16 caused Plaintiff's skin condition to get worse?
17

18
19 5.) Some people think that no matter what, you should never criticize an employer or
20 supervisor no matter how badly the supervisor or employer acts. These people generally feel
21 that the employee should just quit. Would any of you think less of a person who complained
22 that they were being mistreated by their employer?
23

24 a. How would you feel about that person speaking out about their mistreatment?

25 b. What would you think if that person asked other employees if they had been
26 Similarly mistreated?
27

1 c. What would you think if that person attempted to correct the situation?

2 d. What would you think if that person filed a formal complaint?

3
4 6) The Commonwealth is populated by people from many different cultures. Some cultures
5 are less direct than others in bringing attention to a problem or complaining. The Plaintiff here
6 is a very direct person. Would any of you feel strongly that being a direct person is wrong and
7 be unwilling to decide in the Plaintiff's favor because of her directness?
8

9
10 7.) The Plaintiff has also asserted a claim that the Defendants took certain actions that
11 prevented her from obtaining a new job after she left Hopwood School.

12 a. Have any of you been looking for work or had a close family member looking for
13 work recently?

14 b. Could your experiences or the experiences of your family members in trying to find
15 work influence your decision with regard to the efforts the Plaintiff made?
16

17 c. The Plaintiff has alleged that the Defendants made statements about her that caused
18 her problems in finding new employment. Have any of you had the experience where
19 somebody said bad things about you that affected your ability to find a new job?
20

21
22 Respectfully submitted February 20, 2007:

23 O'CONNOR BERMAN DOTTS & BANES
24 Attorneys for Plaintiff Lisa Black

25 By: _____/s/_____
26 MICHAEL W. DOTTS, ESQ.
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